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March 3, 2021

Hon. Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Tae Hung Kang*
18 CR 184 (RJD)

Dear Judge Dearie:

The parties wish to inform the Court that a settlement of this case has been agreed upon. Mr. Kang is prepared to accept a formal plea agreement dated March 2, 2021. Accordingly, the defense suggests the pretrial conference, currently set for March 5, 2021, will not be necessary. The defendant would like to arrange a date to appear in person to enter a plea pursuant to Rule 11 when convenient for the Court. We understand that "in person" pleas are permitted at this point.

The parties are mindful of the Court's admonition to let it know if the case would be settled so as to free up its trial calendar. We have made efforts to arrange the disposition of this matter as soon as possible.

Respectfully,

/s/ Richard Willstatter
RICHARD D. WILLSTATTER

cc: Julia Nestor
Mathew Miller
Assistant United States Attorneys

Robert Caliendo, Esq.